

REMARKS

Reconsideration and the timely allowance of the pending claims, in view of the following remarks, are respectfully requested.

In the Office Action dated March 18, 2005, the Examiner rejected claims 1-3, 5-9, 12-13, 16-20, and 23-24, under 35 U.S.C. §102(a), as allegedly being anticipated by Yamadadera '707 (JP 2000-13707); rejected claims 4, 11, and 22, under 35 U.S.C. §103(a), as allegedly being unpatentable over Yamadadera '707; rejected claims 10, 15, 21, and 26, under 35 U.S.C. §103(a), as allegedly being unpatentable over Yamadadera '707 in view of Inagaki '697 (JP 2000-13697); and rejected claims 14 and 25, under 35 U.S.C. §103(a), as allegedly being unpatentable over Yamadadera '707 in view of Hassell '685 (U.S. Pat. Pub. 2004/0128685).

By this Amendment, Applicant has cancelled claims 1-26 and has introduced new claims 27-38. Applicant submits that no new matter has been introduced. The cancellation of claims 1-26 renders the prior art rejections of these claims moot. Accordingly, the immediate withdrawal of the prior art rejections of claims 1-26 is requested.

Applicant submits that new claims 27-38 are patentable over the applied references for the following reasons:

I. Patentability of New Claims 27 - 38.

As indicated above, independent claim 27 positively recites a program reservation terminal which communicates with a homepage by way of a communication network and includes external storage control means for storing information elements such as reservation data, in the removable storage medium through a first slot. Independent claim 27 also positively recites the use of a broadcast receiving apparatus that includes reservation processing means for selecting a broadcast program from the guide information storage means based on the reservation data read from the removable storage medium, and executing reservation processing with respect

to the broadcast program based on each information element representing the broadcast program. These features are amply supported by the embodiments disclosed in the Specification. (*See, e.g., Specification*, page 14, lines 21; page 34, line 6 – page 38, line 10 ; FIGs. 2, 5, 11).

As described in the various embodiments, the present invention provides for the acquisition of program guide information by gaining access from a program reservation terminal to a homepage by way of a communication network and storing the reservation data, which the user inputs, based on the acquired program guide. It will be appreciated that, given this configuration, users can acquire the newest guide information from a homepage *without relying on the broadcast receiving apparatus* – and can do so, regardless of where the user is or what time the user wishes to acquire the information. The user can then employ the acquired guide information to enter “program reservation operations”.

In contrast, none of the applied references teach or suggest the combination of features recited by claim 27. In particular, Yamadadera '707 merely discloses a system in which electronic program guide (EPG) data is transferred from a receiver **10** to a portable-type program display device **13** via wireless communication or cable and TV programs are “reserved” by using the transferred EPG data. (*See, e.g., Yamadadera '707: Abstract; par. [0018], [0019]; FIG. 1*). That is, TV programs are simply reserved by transferring the EPG data obtained from the receiver to the display device. As such, guide information must be transmitted from a broadcasting receiving apparatus so that if the broadcast receiving apparatus is powered down or communications cannot be established, guide information cannot be transmitted or reserved.

Moreover, the Yamadadera '707 reference fails to teach or suggest program reservation terminal which communicates with a homepage by way of a communication network and includes external storage control means for storing information elements such as reservation data, in the removable storage medium through a first slot, as required by claim 27. Nor does Yamadadera '707 disclose a broadcast receiving apparatus that includes reservation processing means for selecting a

broadcast program from the guide information storage means based on the reservation data read from the removable storage medium, and executing reservation processing with respect to the broadcast program based on each information element representing the broadcast program, as also required by claim 27.

Regarding the Inagaki '697 reference, Inagaki '697 teaches a system in which television program lineup information is transferred from a receiver **10** to a television program reservation apparatus **30**, via a telephone line, which uses the information to make "program reservations". (See Inagaki '697: Abstract; par. [0042], [0043]; FIG. 3).

Much like the teachings of the Yamadadera '707 reference, the Inagaki '697 system requires that guide information must be transmitted from a broadcasting receiving apparatus so that if the broadcast receiving apparatus is powered down or communications cannot be established, guide information cannot be transmitted or reserved. In addition, like Yamadadera '707, the Inagaki '697 reference fails to teach or suggest program reservation terminal which communicates with a homepage by way of a communication network and includes external storage control means for storing information elements such as reservation data, in the removable storage medium through a first slot, as required by claim 27. Nor does Inagaki '697 disclose a broadcast receiving apparatus that includes reservation processing means for selecting a broadcast program from the guide information storage means based on the reservation data read from the removable storage medium, and executing reservation processing with respect to the broadcast program based on each information element representing the broadcast program, as also required by claim 27.

With respect to the Hassell '685 reference, Hassell '685 is directed to an interactive program guide system with digital storage that allows the program guide to be used certain advanced features. (See Hassell '685; par. [0006]; FIGs. 1-3). Applicant submits, however, that there is nothing in Hassell '685 that teaches or suggests or suggest program reservation terminal which communicates with a homepage by way of a communication network and includes external storage control

means for storing information elements such as reservation data, in the removable storage medium through a first slot, as required by claim 27. Nor does Hassell '685 disclose a broadcast receiving apparatus that includes reservation processing means for selecting a broadcast program from the guide information storage means based on the reservation data read from the removable storage medium, and executing reservation processing with respect to the broadcast program based on each information element representing the broadcast program, as also required by claim 27.

For at least these reasons, Applicant submits that neither the Yamadadera '707, Inagaki '697, nor the Hassell '685 references, whether taken alone or in reasonable combination, teach the claimed combination of elements recited by new independent claim 27. Accordingly, claim 27 is patentable over these references. Moreover, because claim 28 depends from claim 27, claim 27 is patentable at least by virtue of dependency as well as for its additional recitations.

Further, because independent claims 30 and 33 recite similar features to claim 27, claims 30 and 33 are patentable for at least the reasons presented with respect to claim 27. Also, because claims 31 and 32 and claim 34 depend from claims 30 and 33, respectively, claims 31 and 32 and claim 34 are patentable at least by virtue of dependency as well as for their additional limitations.

Regarding independent claims 29, 35, and 36, these claims also recite similar features to claim 27 and are, therefore, also patentable for the reasons presented regarding claim 27. In addition, however, claims 29, 35, and 36 further recite that when program reservation processing is executed by a broadcasting receiving apparatus, or when reservation data is stored in a removable storage medium of a program reservation terminal, a first-bit-sequence reservation data, read from the removable storage medium, is converted into a second-bit-sequence reservation data, defined by the broadcast program guide information, and program reservation processing or storage processing with respect to the removable storage medium is performed using the second-bit-sequence reservation data. Such features are amply

supported by the embodiments disclosed in the Specification. (*See, e.g., Specification*, page 17, line 25 -page 18, line 24).

In this manner, even if the data format of reservation data input at a program reservation terminal were different from the data format of an EPG used by a broadcasting receiving apparatus, the data format of the reservation data can be changed to conform to the data format of the EPG, in advance. In other words, even if the data formats of reservation data were different for each program reservation terminal, the data format of all read reservation data can be changed to conform to the data format of an EPG

Applicant further submits that none of the references of record appear to contain the features of converting a first-bit-sequence data entered in a program reservation terminal, into a second-bit-sequence data, defined by broadcast program guide information and employing the second-bit-sequence data to execute program reservation processing or storage processing with respect to a removable storage medium, as required by claims 29, 35, and 36.

Thus, for these additional reasons, claims 29, 35, and 36 are also patentable. And, because claims 37-38 depend from claim 36, claims 37-38 are patentable at least by virtue of dependency as well as for their additional limitations.

II. Conclusion.

All matters having been addressed and in view of the foregoing, Applicant respectfully requests the entry of this Amendment, the Examiner's reconsideration of this application, and the immediate allowance of all pending claims.

Applicant's Counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter.

Please charge any fees associated with the submission of this paper to Deposit Account Number **033975**, Order No. 008312-0279078. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

PILLSBURY WINTHROP SHAW PITTMAN LLP



E. RICO HERNANDEZ
Reg. No. 47641
Tel. No. (703) 905-2088
Fax No. (703) 905-2500

ERH/smm
P.O. Box 10500
McLean, VA 22102
(703) 905-2000